



BOULT • CUMMINGS
CONNERS • BERRY PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

REC'D TO
REGULATORY AUTH.

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July 6, 2001

OFFICE OF
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: Tariff Filings by all Telephone Companies Regarding Reclassification of
Pay Telephone Service as Required by FCC Order 96-439
Docket No. 97-00409

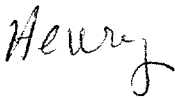
Dear David:

Enclosed for filing are the original and thirteen copies of the response of the
Tennessee Payphone Owners Association to the interrogatories and request for production of
United Telephone-Southeast, Inc. in the above-captioned proceedings.

Copies are being served on counsel of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: ALL TELEPHONE COMPANIES TARIFF FILINGS REGARDING
RECLASSIFICATION OF PAY TELEPHONE SERVICE AS REQUIRED
BY FCC ORDER 96-439
Docket No. 97-00409**

**TENNESSEE PAYPHONE OWNERS ASSOCIATION
RESPONSE TO INTERROGATORIES
OF UNITED TELEPHONE-SOUTHEAST, INC.**

Interrogatories

1. UTSE filed its Tennessee payphone access line cost study on March 6, 2001 and later filed a revised cost study on May 1, 2001 pursuant to TRA request (Cost Studies). Please state the name(s) of all persons the TPOA has presently hired or plans to hire to review UTSE's Cost Studies.

ANSWER: TPOA has retained Don Wood to assist counsel in reviewing UTSE's cost studies. He is the same witness who has previously filed testimony in this proceeding.

2. Please state the name(s) of all other persons the TPOA has caused or plans to have review UTSE's Cost Studies.

ANSWER: None, at this time.

3. Please state the name(s) of all persons whom the TPOA has hired or plans to hire to review the payphone cost studies of BellSouth Telecommunications, Inc.; Citizens Telecommunications Company of Tennessee; and/or Citizens Telecommunications Company of the Volunteer State to compare with UTSE's Cost Studies. Specify which persons have been or will be hired to review the costs studies of which company.

ANSWER: Don Wood

4. Please state the name(s) of all other persons the TPOA has caused or plans to have review the BellSouth and/or Citizens cost studies. Please state which persons have or will review the cost studies of which company.

ANSWER: None, at this time.

5. Please state the name(s) of all persons the TPOA plans to present as witnesses (expert or otherwise) in any hearing before the TRA concerning UTSE's Cost Studies. Please state the particular subject matter upon which each witness is expected to testify, the substance of the facts and opinions (if an expert) to which each witness will testify, and a summary of the ground for each expert witness' opinion.

ANSWER: Don Wood will be TPOA's expert witness. At this time, Mr. Wood has not completed his analysis of UTSE's cost study. When his analysis is finished, it will be filed with the TRA in the form of testimony. At the same time, a copy will be served upon UTSE. TPOA may or may not introduce the testimony of payphone owners in UTSE's territory. That decision has not yet been made.

6. The TRA's February 1, 2001 *Interim Order* stated that incumbent LECs' payphone rates must be (a) cost based, (b) consistent with the requirements of section 276 of the federal act, (c) nondiscriminatory and (d) compliant with the so called "new services test". Please state the *Interim Order* requirements that the TPOA believes Sprint's Cost Studies fails to meet. In particular, please specify which component of Sprint's cost study – loops, switching, transport, overhead, inputs, payphone specific study, etc. – fails to meet which requirement and explain in full.

ANSWER: This information will be provided in Don Wood's testimony which will be provided to UTSE at the same time it is filed with the TRA.

Request for Production of Documents

1. Please provide copies of any documents you have that analyzes UTSE's March 6th or May 1st payphone cost studies.

ANSWER: There are no such documents in existence at this time. When Mr. Wood completes his analysis of UTSE's cost study and files that analysis, in the form of testimony, with the TRA, a copy will be served upon UTSE.

2. Please provide copies of any documents you have that compare UTSE's Cost Studies to the cost studies of BellSouth or Citizens.

ANSWER: See answer to number one.

3. Please provide copies of any cost study you have, not prepared by UTSE, that concerns UTSE's payphone access line rates.

ANSWER: See answer to number one.

4. Please provide copies of any documents that the TPOA plans to use or introduce into the record in this proceeding.

ANSWER: See answer to number one.

5. Does the TPOA have specific rates for UTSE's payphone services that it believes meets the requirements of the *Interim Order*? If so, please provide the rates and all supporting rationale.

ANSWER: When Mr. Wood completes his analysis of UTSE's cost study and files that analysis with the TRA, a copy will be served upon UTSE. That analysis will include his recommended rates.

6. Please provide copies of any documents you provide to any other party or person during this proceeding regarding UTSE's cost studies, including copies of all response to discovery or requests for information or data from the Staff of the TRA.

ANSWER: At this time, there have been no such requests.

7. Please provide copies of any documents you used or relied upon in responding to any interrogatory.


ANSWER: There are none.

Submitted this 6th day of July, 2001.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2001, a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

Richard Collier, Esq.
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

R. Dale Grimes, Esq.
T.G. Pappas, Esquire
Bass, Berry & Sims
2700 First American Center
Nashville, Tennessee 37219-8888

James Wright, Esquire
United Telephone-Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

Jon Hastings, Esquire
Boult, Cummings, Conners & Berry
414 Union Street, Suite 1600
Nashville, Tennessee 37219-8062

Guilford F. Thornton, Jr., Esq.
Stokes Bartholomew Evans & Petree
Sun Trust Center
424 Church St., Suite 2800
Nashville, TN 37219-2386

Guy M. Hicks, Esquire
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

Tim Phillips, Esq.
Consumer Advocate and Protection Division of
the Attorney General's Office
P.O. Box 20207
Nashville, TN 37202


Henry Walker